

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-66 THROUGH 71]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

September 7, 2011

Respectfully submitted,

N20111L66

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-66 Please refer to your response to Interrogatory DBP/USPS-50 subpart [a].

[a] Your response appears to indicate that none of the facilities being proposed for discontinuance or consolidation have customers who receive delivery service to their street address by a city delivery carrier, rural delivery carrier, or HCR carrier. Please confirm or explain.

[b] Please explain the process that a customer must follow with respect to filing a change of address order if his/her post office is discontinued and he/she will experience a change in the address to which the mail must be addressed. Please provide separate responses, if necessary, depending on whether the customer chooses the preferred new method of receiving mail or decides to choose his/her own method.

DBP/USPS-67 Please refer to your response to Interrogatory DBP/USPS-50 subparts [b] through [i].

[a] The original Interrogatory asks for specific information which is not covered in your reference to POM Section 682.22. Please provide the information that was requested in the original subparts [b] through [i].

[b] POM Section 682.22 refers to single-piece-rate Standard Mail. Is this service still available? Are Presorted Standard and Presorted Non-Profit mail forwarded without added charge?

[c] How will employees at the delivery office be aware that mail [which is normally not forwarded without charge] is being forwarded as a result of a discontinued office and therefore should not be charged postage due?

DBP/USPS-68 Please refer to your response to Interrogatory DBP/USPS-52 subpart [a]. What specific sections of USPS Handbook 101 apply?

DBP/USPS-69 Please refer to your response to Interrogatory DBP/USPS-53. While I may be aware that my local post office sells 29¢ stamps for post card use and Forever stamps for First-Class Mail letters, I am not aware to the percentage of transactions that apply to each of the options. Please respond to the original Interrogatory.

DBP/USPS-70 Please refer to your response to Interrogatory NPL/USPS-8.

[a] Please confirm or explain that all of these added amenities that you indicate might be available at the nearest remaining office will still be there whether the local office is closed or not.

[b] Please confirm or explain that in general the customer who patronizes a specific facility does so after evaluating all of the options and therefore likely will feel that their customer experience has been reduced if their choice of facilities is discontinued.

DBP/USPS-71 Please refer to the updated Library Reference USPS-LR-N2011-1/4.

The original document had a total of approximately 3459 pages and the updated document has a total of approximately 2240 pages. The only explanation provided by the Postal Service was that it was placed in a form more consistent with the filing of other library references in this docket.¹

[a] Please describe in detail the changes that were made in the filing of the revised version.

[b] On what basis are the individual offices sorted in the listing of facilities?

[c] To the extent that questions contained in Interrogatory DBP/USPS-62 still apply to the revised Library Reference, a response is still desired.

¹ USPS Notice filed September 6, 2011 at 1.